

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES, et al.,

Defendants.

No. 1:25-cv-11048-ADB

MOTION FOR LEAVE TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Local Rule 83.5.3(e) of the United States District Court for the District of Massachusetts, undersigned counsel respectfully moves this Court to grant leave for John P. Relman to appear as counsel on behalf of *Amici Curiae* former United States agency officials responsible for enforcing Title VI, 42 U.S.C. § 2000d *et seq.*, and to practice before this Court in the above-captioned action. As grounds for this Motion, undersigned counsel relies on the attached certification, which states:

1. John P. Relman is the Founding Partner at the law firm Relman Colfax PLLC, located at 1225 19th Street NW, Suite 600, Washington, DC 20036, with telephone number (202) 728-1888;
2. He is a member in good standing in every jurisdiction in which he has been admitted to practice;
3. He has not been disciplined by and is not the subject of disciplinary proceedings pending in any jurisdiction in which he is a member of the bar;

4. He has not previously had a *pro hac vice* admission to this Court (or other admission for a limited purpose under this rule) revoked for misconduct; and
5. He has read and agrees to comply with the Local Rules of the United States District Court for the District of Massachusetts.

Therefore, undersigned counsel respectfully moves that Glenn Schlactus be admitted to practice before this court *pro hac vice*.

Dated: June 9, 2025

Respectfully submitted,

/s/ Tara Ramchandani
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Counsel for Amici Curiae

LOCAL RULE 7.1(a)(2) CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), undersigned counsel hereby certifies that counsel for *Amici Curiae* conferred with counsel for the Parties, who do not oppose this motion.

/s/ Tara Ramchandani
Tara Ramchandani

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Leave to Appear *Pro Hac Vice* was filed through the Court's CM/ECF system on June 9, 2025 and will be sent electronically to registered participants as identified on the Notice of Electronic Filing.

/s/ Tara Ramchandani
Tara Ramchandani